

ORIGINAL

OPEN MEETING

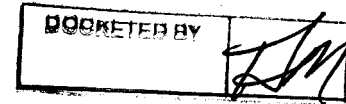
MEMORANDUM

RECEIVED



Arizona Corporation Commission
DOCKETED

FEB 28 2013



TO: THE COMMISSION 2013 FEB 28 A 11: 54

FROM: Utilities Division AZ CORP COMMISSION
DOCKET CONTROL

DATE: February 28, 2013

RE: NAVOPACHE ELECTRIC COOPERATIVE, INC. – APPLICATION FOR
APPROVAL OF RENEWABLE ENERGY STANDARD PLAN AND
TARIFFS. (DOCKET NO. E-01787A-12-0447)

On October 30, 2012, Navopache Electric Cooperative, Inc. (“NEC”) filed an application for approval of its 2013 Implementation Plan pursuant to the Renewable Energy Standard and Tariff (“REST”) Rules. NEC forecasts 393.6 gigawatt-hours in retail sales to its membership in 2013.

Renewable Energy Requirement

Under the REST Rules, investor-owned utilities (“IOUs”) are required to meet specific annual percentage-of-sales targets for both Renewable Energy Resources and Distributed Renewable Energy Resources. However, electric cooperatives are excluded from these specific requirements by R-14-2-1814. Electric cooperatives, instead, are required to submit “...appropriate plans for acquiring Renewable Energy Credits...”.

NEC proposes to obtain approximately 0.89 percent of its forecast 2013 retail sales from Renewable Energy Resources in the subject plan. This compares to a range of 0.19 to 1.02 percent of sales for other Arizona electric cooperatives. In comparison, the REST Rule requirement for IOUs in 2013 is 4 percent of retail sales, of which 30 percent must be Distributed Renewable Energy Resources.

NEC’s Renewable Infrastructure

NEC’s REST Plan for 2013 consists of using existing utility- and member-owned renewable resources. Since 2003, NEC has installed and interconnected four separate utility-owned photovoltaic (“PV”) systems to the distribution system. The four systems have a combined capacity of approximately 270 kW.

NEC currently has 165 member-installed renewable energy systems in operation. The NEC member-installed systems include photovoltaic systems, solar thermal systems, and wind turbines. A summary of NEC’s renewable resources is presented in Table 1.

Table 1
2012 Renewable Energy Resources

| Resource | NEC 2012 | |
|------------------------------------|--------------|------------------|
| | kW Capacity | kWh Energy |
| Utility-Owned Renewable Generation | 278 | 608,820 |
| Member-Owned Dist. Generation | 1,328 | 2,908,320 |
| Purchased Power (RECs) | 0 | 0 |
| Total | 1,606 | 3,517,140 |

NEC claims to be in negotiations to purchase Renewable Energy Credits (“RECs”) from a proposed biomass project. However, NEC does not anticipate making actual REC purchases from this facility until 2014.

NEC’s 2013 REST Implementation Plan

NEC has proposed a number of changes to its Renewable Energy Incentive Plan (“REIP”) for 2013. Specifically, NEC proposes to make the following revisions:

1. Change the Residential Grid-Tied Up-Front Incentive (“UFI”) from \$3 per watt, up to 50 percent of the installed cost with a maximum amount of \$25,000 to \$0.50 per watt, up to 50 percent of the installed cost, less any grant funds applied to the cost of the installation with a maximum amount of \$5,000 and limited to 10 kW maximum systems;
2. Eliminate the Residential Off-Grid UFI;
3. Change the Non-Residential Grid-Tied UFI from \$3 per watt, up to 50 percent of the installed cost with a maximum amount of \$25,000 to \$0.50 per watt, up to 50 percent of the installed cost, less any grant funds applied to the cost of the installation with a maximum amount of \$12,500 and limited to 50 kW maximum systems;
4. Add a member leased program to the REIP;
5. Add a statement requiring the system to be installed and operational within 120 calendar days of the approval of the incentive application.
6. Add a statement that the renewable energy systems must have a generating capacity less than or equal to 125% of the customers total connected load measured in kWh in order to be eligible to receive the incentive.
7. Add a \$75 trip charge for each inspection after the initial inspection. The initial inspection is at no cost to the customer.
8. Add language to allow NEC to collect the approved REST surcharge cap amount from members who receive REIP incentive payments.
9. Add language clarifying the incentive payment waiting list process.

Staff has reviewed these proposed changes to NEC's REIP and finds them acceptable, except for NEC's proposal to collect the approved REST surcharge cap from members that receive REIP payments. Staff recommends that NEC be ordered to collect the REST surcharge average charge per class from those members that have received REIP incentive payments.

REST Plan Funding and Expenditures

Staff has reviewed NEC's proposed Renewable Energy Standard Tariff. The tariff sets forth the surcharge rates and monthly maximums to be collected to fund NEC's renewable energy budget for 2013. The proposed tariff charges are unchanged from those previously approved by Commission Decision Nos. 71408 and 72383. The proposed tariff charges are shown in Table 2. The expected number of customers reaching the monthly collection caps is shown in Table 3. NEC also provided Staff with a breakdown of what percentage of its members will pay the maximum monthly cap amount, which is detailed in Table 3.

Table 2
2013 Proposed RES Tariff Charges

| Customer Class/Category | <i>Rates</i> | |
|---|-------------------------|-------------|
| | Energy Charge (per kWh) | Monthly Cap |
| Residential | \$0.004988 | \$1.05 |
| Commercial & Industrial | \$0.004988 | \$39.00 |
| Commercial & Industrial \geq 3 MW | \$0.004988 | \$117.00 |
| Governmental & Agricultural | \$0.000875 | \$13.00 |
| Governmental & Agricultural \geq 3 MW | \$0.000875 | \$39.00 |

Table 3
Customers Reaching Surcharge Caps

| Customer Class/Category | Percent Reaching Cap | Monthly Cap | Percent Not Reaching Cap | Average Surcharge per Bill |
|--|----------------------|-------------|--------------------------|----------------------------|
| Residential | 48.2% | \$1.05 | 51.8% | \$0.24 |
| Commercial | 6.1% | \$39.00 | 93.9% | \$4.55 |
| Irrigation | 27.6% | \$13.00 | 72.4% | \$1.72 |
| Non-Residential \geq 3 MW ¹ | 0.0% | \$117.00 | 0% | \$0 |

NEC's proposed budget for 2013 is shown in Table 4. NEC's expected surcharge revenue and carry-over amount from past years are also shown in Table 4. The difference between the available funding and the annual expenditures would roll over to 2014.

¹ NEC's only customer with a demand \geq 3MW, Fort Apache Timber Company, ceased operations in 2011.

Table 4
2013 REST Plan Revenue & Expenditures

| Customer Class/Category | Projected 2013 Revenue |
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| Residential | \$352,000 |
| Commercial | \$323,000 |
| Irrigation | \$14,000 |
| Security Lighting | \$1,200 |
| Non-Residential ≥ 3 MW ¹ | \$0 |
| Total 2013 Collections | \$690,200 |
| 2012 Balance Carry-Over | \$300,000 |
| Total 2013 REST Funding | \$990,200 |
| Expenditures | |
| Utility-Owned PV (RUS Loan Payments) | \$62,000 |
| Net Metering Payments | \$5,000 |
| Tier 1 Backlog: Approved Customer Applications (@\$3/Watt) | \$338,101 |
| Tier 2 Backlog: Customer Applications Awaiting Approval (@ \$0.50/Watt) | \$176,375 |
| New Residential Incentives (@ \$0.50/Watt) | \$157,150 |
| New Commercial Incentives (@ \$0.50/Watt) | \$78,574 |
| REST Plan Administration | \$173,000 |
| Total 2013 REST Plan Expenditures | \$990, 200 |

The budget presented in Table 4 illustrates NEC's response to a REST Program issue that became apparent in 2012. NEC experienced a large increase in members seeking incentives under the existing NEC REST program that offers incentives at the relatively high rate of \$3.00 per Watt. Due to NEC's high incentive rate, coupled with aggressive marketing by solar system installers, NEC was inundated with incentive applications. To meet demand, NEC instituted a reservation system that placed members on a wait list in an effort to balance incentive demand with REST fund collections. In mid-summer 2012, NEC instituted a second tier to its incentive reservation system by closing the reservation list to all new applications at the ~~\$3.00~~ per Watt incentive rate. Going forward, members are placed on the second tier of NEC's reservation system at an incentive rate of \$0.50 per Watt.

As depicted in Table 4, NEC is projected to collect sufficient REST funds to pay down both the first and second tier backlog of incentives, with funds remaining for new incentives in 2013, assuming that the Commission approves NEC's request to lower its incentives to \$0.50 per

Watt. Staff supports NEC's proposed 2013 REST budget, with the proviso that NEC have the flexibility to shift funds between the Residential and Commercial incentive line items based on member demand.

Staff notes that the "Net Metering Payments" itemized as an expenditure in NEC's proposed 2013 REST Plan budget is a power purchase expense that would be more appropriately recovered through NEC's power cost adjustor mechanism.

Annual REST Plan Submittal Schedule

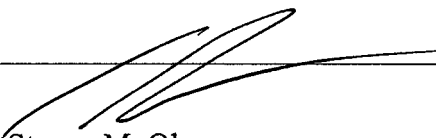
Staff reminds NEC that the REST Rules require that electric cooperatives file an annual REST Implementation Plan by July 1st of the prior year. Staff notes that NEC is not in compliance with the REST Plan submittal requirements contained in R14-2-1814, having made its 2013 Plan submittal on October 30, 2012. Staff recommends that NEC be ordered to comply with the REST Plan submittal schedule requirements beginning with the 2014 REST Implementation Plan which shall be filed on or before July 1, 2013.

REST Plan and Report Formats

Under Decision No. 72737, dated January 18, 2012, the Commission ordered the formation of a REST Format Working Group ("Working Group") to prepare format guidelines for future REST Implementation Plans and REST Compliance Reports. The Working Group docketed a report with its recommendations on August 31, 2012, and a letter indicating Staff's approval of the recommendations was docketed on February 19, 2013. The effective date for usage of the templates is April 1, 2013, for the 2012 Compliance Reports and July 1, 2013, for the 2014 REST Implementation Plans.

Staff Recommendations

Staff recommends that the Commission approve NEC's 2013 REST Plan as discussed herein. Staff further recommends that NEC be ordered to collect the REST surcharge average charge per class from those members that have received REIP incentive payments. Staff further recommends that NEC be ordered to comply with the report submittal schedule requirements contained in R14-2-1814 beginning with the 2014 REST Implementation Plan which shall be filled on or before July 1, 2013. Staff further recommends that NEC be ordered to implement the recommendations of the REST Format Working Group.



Steven M. Olea
Director
Utilities Division

SMO:RBL:sms\RRM

ORIGINATOR: Rick Lloyd

1 **BEFORE THE ARIZONA CORPORATION COMMISSION**

2 BOB STUMP

Chairman

3 GARY PIERCE

Commissioner

4 BREND A BURNS

Commissioner

5 BOB BURNS

Commissioner

6 SUSAN BITTER SMITH

Commissioner

7
8 IN THE MATTER OF NAVOPACHE
9 ELECTRIC COOPERATIVE, INC.'S
10 APPLICATION FOR APPROVAL OF
11 RENEWABLE ENERGY STANDARD
12 PLAN AND TARIFFS.

DOCKET NO. E-01787A-12-0447

DECISION NO. _____

ORDER

13
14 Open Meeting
15 March 12, 2013 and March 13, 2013
16 Phoenix, Arizona

BY THE COMMISSION:

17 FINDINGS OF FACT

18 1. Navopache Electric Cooperative, Inc. ("NEC") is certificated to provide electric
19 service as a Public Service Corporation in the State of Arizona.

20 2. On October 30, 2012, NEC filed an application for approval of its 2013
21 Implementation Plan pursuant to the Renewable Energy Standard and Tariff ("REST") Rules.
22 NEC forecasts 393.6 gigawatt-hours in retail sales to its membership in 2013.

23 **Renewable Energy Requirement**

24 3. Under the REST Rules, investor-owned utilities ("IOUs") are required to meet
25 specific annual percentage-of-sales targets for both Renewable Energy Resources and Distributed
26 Renewable Energy Resources. However, electric cooperatives are excluded from these specific
27 requirements by R-14-2-1814. Electric cooperatives, instead, are required to submit
28 "...appropriate plans for acquiring Renewable Energy Credits..."

4. NEC proposes to obtain approximately 0.89 percent of its forecast 2013 retail sales from Renewable Energy Resources in the subject plan. This compares to a range of 0.19 to 1.02 percent of sales for other Arizona electric cooperatives. In comparison, the REST Rule requirement for IOUs in 2013 is 4 percent of retail sales, of which 30 percent must be Distributed Renewable Energy Resources.

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2 watt, up to 50 percent of the installed cost with a maximum amount of \$25,000 to
3 \$0.50 per watt, up to 50 percent of the installed cost, less any grant funds applied to
4 the cost of the installation with a maximum amount of \$5,000 and limited to 10 kW
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8 percent of the installed cost with a maximum amount of \$25,000 to \$0.50 per watt,
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14 120 calendar days of the approval of the incentive application.
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16 capacity less than or equal to 125% of the customers total connected load measured
17 in kWh in order to be eligible to receive the incentive.
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19 initial inspection is at no cost to the customer.
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21 amount from members who receive REIP incentive payments.
- 22 I. Add language clarifying the incentive payment waiting list process.

23 9. Staff has reviewed these proposed changes to NEC's REIP and finds them
24 acceptable, except for NEC's proposal to collect the approved REST surcharge cap from members
25 that receive REIP payments. Staff has recommended that NEC be ordered to collect the REST
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26 Implementation Plans.

27 ...

28 ...

Staff Recommendations

17. Staff has recommended that the Commission approve NEC's 2013 REST Plan as discussed herein. Staff has further recommended that NEC be ordered to collect the REST surcharge average charge per class from those members that have received REIP incentive payments. Staff has further recommended that NEC be ordered to comply with the report submittal schedule requirements contained in R14-2-1814 beginning with the 2014 REST Implementation Plan which shall be filled on or before July 1, 2013. Staff has further recommended that NEC be ordered to implement the recommendations of the REST Format Working Group.

CONCLUSIONS OF LAW

1. Navopache Electric Cooperative, Inc. is an Arizona Public Service Corporation within the meaning of Article XV, Section 2, of the Arizona Constitution.

2. The Commission has jurisdiction over Navopache Electric Cooperative, Inc. and over the subject matter of the application.

3. The Commission, having reviewed the application and Staff's Memorandum dated February 28, 2013, concludes that Navopache Electric Cooperative, Inc.'s 2013 REST Implementation Plan should be approved as discussed herein.

ORDER

IT IS THEREFORE ORDERED that Navopache Electric Cooperative, Inc.'s 2013 REST Implementation Plan is approved as discussed herein.

IT IS FURTHER ORDERED that Navopache Electric Cooperative, Inc. shall collect the REST surcharge average charge per class from those members that have received REIP incentive payments.

IT IS FURTHER ORDERED Navopache Electric Cooperative, Inc. shall comply with the report submittal schedule requirements contained in R14-2-1814 beginning with the 2014 REST Implementation Plan which shall be filled on or before July 1, 2013.

...

...

1 IT IS FURTHER ORDERED that Navopache Electric Cooperative, Inc. shall implement
2 the recommendations of the REST Format Working Group.

3 IT IS FURTHER ORDERED that Navopache Electric Cooperative, Inc. shall file a tariff
4 reflecting the surcharge rates and caps listed in Table 2 herein in compliance with the Decision in
5 this case within 15 days of the effective date of that Decision.

6 IT IS FURTHER ORDERED that this Decision shall become effective immediately.

7
8 **BY THE ORDER OF THE ARIZONA CORPORATION COMMISSION**

9
10 CHAIRMAN

COMMISSIONER

11
12
13 COMMISSIONER

COMMISSIONER

COMMISSIONER

14
15 IN WITNESS WHEREOF, I, JODI JERICH, Executive
16 Director of the Arizona Corporation Commission, have
17 hereunto, set my hand and caused the official seal of this
18 Commission to be affixed at the Capitol, in the City of
19 Phoenix, this _____ day of _____, 2013.

20 _____
21 JODI JERICH
22 EXECUTIVE DIRECTOR

23 DISSENT: _____

24 DISSENT: _____

25 SMO:RBL:sms/RRM
26
27
28

SERVICE LIST FOR: Navopache Electric Cooperative, Inc.'s Application For Approval Of Renewable Energy Standard Plan And Tariffs.

DOCKET NO. E-01787A-12-0447

Charles Moore, P.E.
Chief Executive Officer
Navopache Electric Cooperative, Inc.
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Lakeside, Arizona 85929

Ms. Heather McNelly
Renewable Resources Specialist
Navopache Electric Cooperative, Inc.
1878 W. White Mountain Blvd.
Lakeside, Arizona 85929

Mr. John Wallace
Director or Regulatory & Strategic Services
Grand Canyon State Electric Cooperative Association, Inc.
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Phoenix, AZ 85034-1822

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Director, Utilities Division
Arizona Corporation Commission
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Phoenix, Arizona 85007

Ms. Janice M. Alward
Chief Counsel, Legal Division
Arizona Corporation Commission
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Ms. Lyn Farmer
Chief Administrative Law Judge,

Hearings Division
Arizona Corporation Commission
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Phoenix, AZ 85007